

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

LAURELL WELLS,

Defendant.

**DEFENDANT LAURELL WELLS'
PROPOSED VOIR DIRE**

S1 20-cr-0633 (JSR)

DEFENDANT'S PROPOSED VOIR DIRE

Defendant Laurell Wells requests that the Court, pursuant to Federal Rule of Criminal Procedure 24(a), include the questions below in its questioning of prospective jurors, as a supplement to the questions typically asked by the Court. Pursuant to Federal Rule of Criminal Procedure 24(a)(2)(b), the defendant also request permission to submit further questions that the Court may ask based on juror responses.

The defendant further requests that the Court pursue additional questioning of prospective jurors at sidebar or otherwise outside the hearing of other prospective jurors as appropriate to determine whether circumstances would influence the juror in favor of or against any of the parties, or otherwise affect the juror's ability to serve as a fair and impartial juror in this case.

1. Do you, or does anyone close to you, work at a bank or other financial institution?
2. Have you, or anyone close to you, been terminated from employment for any kind of fraudulent conduct?

3. Have you, or anyone else close to you, ever been investigated, arrested or charged in a criminal case? **[Defendant requests that the Court follow up in such areas outside the presence of other prospective jurors.]** If so, is there anything about that experience that could cause you to be unfair or impartial?
4. Have you, or anyone else close to you, been the victim of internet fraud, identity theft, bank fraud or some other type of fraud? **[Defendant requests that the Court follow up in such areas outside the presence of other prospective jurors.]** Is there anything about this experience that could influence your ability to be a fair and impartial juror?
5. Have you, or anyone close to you, been approached by an individual or group of individuals to cash fraudulent checks, use any fake identification, or otherwise engage in fraudulent conduct? **[Defendant requests that the Court follow up in such areas outside the presence of other prospective jurors.]** Is there anything about this experience that could influence your ability to be a fair and impartial juror?
6. Have you, or anyone close to you, ever considered pursuing a career in, or applied for a job in, law enforcement, criminal justice, security or private investigations?
7. Do you, or does anyone close to you, work as a state or federal law enforcement officer?
8. Have you, or anyone else close to you, had a negative or inappropriate interaction with a law enforcement officer?
9. Have you ever had a negative experience on a dating website or application?

10. Has anyone close to you ever had a negative experience on a dating application or website, including but not limited to a person impersonating another individual or fictionalized individual – sometimes referred to as “catfishing”?

Date: September 14, 2023

Respectfully submitted,

/s/ Kelly T. Currie

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